

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MOOG INC.,

Plaintiff,

v.

Case No.: 1:22-cv-00187

SKYRYSE, INC., ROBERT ALIN
PILKINGTON, MISOOK KIM, and DOES NOS.
1-50,

Defendants.

DECLARATION OF RENA ANDOH

RENA ANDOH, under penalty of perjury and pursuant to 28 U.S.C. § 1746,
declares the following to be true and correct:

1. My name is Rena Andoh. I am a partner at Sheppard, Mullin, Richter & Hampton LLP. I am over the age of 18 years old. I have personal knowledge of the matters set forth herein and if called as a witness, I could and would competently testify as to all facts set forth herein. I am counsel for plaintiff Moog Inc. (“Moog”) and I provide this declaration in support of Moog’s Opposition to Skyryse’s Motion to Compel Trade Secrets Identification.

2. Attached as Exhibit “A” is a true and correct copy of Moog’s March 21, 2022 letter.

3. Attached as Exhibit “B” is a true and correct copy of e-mail correspondence between counsel for Moog and counsel for defendants between March 17 and 23, 2022.

4. Attached as Exhibit “C” is a true and correct copy Moog’s April 4, 2022 letter to counsel for Defendants.

5. Attached as Exhibit “D” is a true and correct copy of e-mail correspondence between counsel for Moog and counsel for defendants between April 11 and 12, 2022.

6. Attached as Exhibit “E” is a true and correct copy of e-mail correspondence between counsel for Moog and counsel for defendants, and iDS between June 30 and July 1, 2022.

7. Attached as Exhibit “F” is a true and correct copy of Skyrise’s April 1, 2022 letter.

8. Attached as Exhibit “G” is a true and correct copy of the Court’s May 25, 2022 e-mail to counsel for all parties.

9. Attached as Exhibit “H” are true and correct copies of defendant Misook Kim’s responses to Moog’s Requests for Admission and defendant Robert Alin Pilkington’s responses to Moog’s Requests for Admission, both served on April 13, 2022.

I declare that the foregoing is true and correct under penalty of perjury under the laws of the United States of America.

Dated: July 5, 2022

/s/ Rena Andoh
Rena Andoh